INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

September 8, 2003

TO: Interested Parties / Applicant

RE: Fort Wayne Liquid Coatings, Inc. / F003-13588-00010

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 8/11/03

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Fort Wayne Liquid Coatings, Inc.
3700 East Pontiac Street
Fort Wayne, Indiana 46803

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F003-13588-00010	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 8, 2003 Expiration Date: September 8, 2008

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary custom paint and stencil operation.

Authorized individual:	President
Source Address:	3700 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address:	2401 Meyer Road, Fort Wayne, Indiana 46803
General Source Phone:	(260) 562-9345
SIC Code:	3479, 7389, 8999
Source Location Status:	Allen Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) airbrush paint booth, identified as AB-1, consisting of two step process including the application of decorative inks in an open building area and the application of clear coatings inside the wet paint booth, using air atomization spray application, coating a maximum of 0.40 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as AB-1A and AB-1B.

(b) One (1) wet paint booth, identified as booth 1, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 1 and WPB 2.

(c) One (1) wet paint booth, identified as booth 2, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 3 and WPB4.

(d) One (1) powder coating operation, identified as PC 1, with a maximum powder usage of 135 pounds per hour, using dry filters for particulate control, and exhausting indoors.

(e) One (1) single chamber office paper incinerator, identified as INC 1, constructed in 1980, burning a maximum of 250 pounds of waste paper per hour, with a natural gas-fired primary chamber afterburner, rated at 0.8 MMBtu per hour, exhausting through one (1) stack (ID No. S/V-8).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:

(1) Two (2) natural gas fired boilers burning No. 2 fuel oil as back-up, identified as B-2 and B-3, each constructed in 1996, each with a maximum heat input capacity of 5.845 MMBtu/hr, and each exhausting to one (1) stack, identified as stack #7 and stack #9, respectively.

(2) Wash section with one (1) water heater rated at 2.5 MMBtu/hr, and exhausting at two (2) stacks, identified as WP 1A and WP 1B.

(3) Dry off section with one (1) burner rated at 1.0 MMBtu/hr, and exhausting at two (2) stacks, identified as WP 2A and WP 2B.

(4) One (1) cure and bake oven with a maximum rated capacity of 3.5 MMBtu/hr, and exhausting at two (2) stacks, identified as WP 3A and WP 3B.

(b) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ , any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ , in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (PSD);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day

period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) airbrush paint booth, identified as AB-1, consisting of two step process including the application of decorative inks in an open building area and the application of clear coatings inside the wet paint booth, using air atomization spray application, coating a maximum of 0.40 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as AB-1A and AB-1B.

(b) One (1) wet paint booth, identified as booth 1, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 1 and WPB 2.

(c) One (1) wet paint booth, identified as booth 2, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 3 and WPB4.

(d) One (1) powder coating operation, identified as PC 1, with a maximum powder usage of 135 pounds per hour, using dry filters for particulate control, and exhausting indoors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

The following construction conditions are only applicable to powder coating operation (PC-1) and wet paint booths (bracket and axle paint booths).

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-2]

The actual VOC emissions from the airbrush paint booth (ID AB-1) shall be limited to less than fifteen (15) pounds per day. Therefore, rule 326 IAC 8-2-2 is not applicable to the airbrush paint booth (ID AB-1).

D.1.5 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to metal parts in booth 1 and booth 2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.6 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the airbrush paint booth (AB-1), the wet paint booths (1 and 2), and the powder coating operation (PC 1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to and 326 IAC 6-3-2(d), particulate from the airbrush paint booth (AB-1), the wet paint booths (1 and 2), and the powder coating operation (PC 1), shall be controlled by dry filters, and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the spray paint facility and its control devices.

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Conditions D.1.4 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Compliance with HAP limitations will also limit VOC emissions.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, AP-1A, AB-1B, WPB1, WPB2, WPB3 and WPB4, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly unless otherwise noted, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4 and D.1.5.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(i) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(ii) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each day.

(4) The total VOC usage for each day; and the actual VOC usage for booth AB-1 for each day.

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, once per shift and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(e) One (1) single chamber office paper incinerator, identified as INC 1, constructed in 1980, burning a maximum of 250 pounds of waste paper per hour, with a natural gas-fired primary chamber afterburner, rated at 0.8 MMBtu per hour, exhausting through one (1) stack (ID No. S/V-8).

Insignificant Activity

(a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:
(1) Two (2) natural gas fired boilers burning No. 2 fuel oil as back-up, identified as B-2 and B-3, each constructed in 1996, each with a maximum heat input capacity of 5.845 MMBtu/hr, and each exhausting to one (1) stack, identified as stack #7 and stack #9, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Solid Waste Incinerator [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P (Incinerators), this office paper natural gas incinerator, rated at 250 pounds per hour shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning wood products.

(c) Comply with 326 IAC 5-1 (Opacity limitations).

(d) Be maintained properly as specified by the manufacturer and approved by IDEM.

(e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.

(g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.

(h) Not create a nuisance or a fire hazard.

(i) not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

D.2.2 Solid Waste Incinerator [326 IAC 4-2-2]

(a) Pursuant to 326 IAC 4-2-2, the office paper natural gas incinerator, rated at 250 pound per hour shall:
  (1) Consist of primary and secondary chambers or the equivalent.
  (2) Be equipped with a primary burner unless burning only wood products.
  (3) Comply with 326 IAC 5-1 and 326 IAC 2.
  (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).
  (5) Not emit particulate matter in excess of three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
  (6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An incinerator is exempt from subsection (a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(c) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:
  (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:
    (A) Procedures for receiving, handling, and charging waste.
    (B) Procedures for incinerator startup and shutdown.
    (C) Procedures for responding to a malfunction.
    (D) Procedures for maintaining proper combustion air supply levels.
    (E) Procedures for operating the incinerator and associated air pollution control systems.
    (F) Procedures for handling ash.
    (G) A list of wastes that can be burned in the incinerator.
  (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
  (3) The operation and maintenance plan must be readily accessible to incinerator operators.
  (4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

D.2.3 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emitted from the two (2) natural gas fired boilers, constructed after 1983 (ID B-2 and B-3) shall be limited to 0.57 lbs of PM per MMBtu, calculated using the following equation:

$Pt = 1.09/Q^{0.26}$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum operation capacity rating = 11.69 MMBtu/hr

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Fort Wayne Liquid Coatings, Inc.
Source Address: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2401 Meyer Road, Fort Wayne, Indiana 46803
FESOP No.: F003-13588-00010

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Fort Wayne Liquid Coatings, Inc.
Source Address: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2401 Meyer Road, Fort Wayne, Indiana 46803
FESOP No.: F003-13588-00010

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Usage Report
(Submit Report Quarterly)

Source Name: Fort Wayne Liquid Coatings, Inc.
Source Address: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2401 Meyer Road, Fort Wayne, Indiana 46803
FESOP No.: F003-13588-00010
Facility: Airbrush paint booth (ID AB-1)
Parameter: VOC
Limit: The total input usage of volatile organic compounds (VOC) at airbrush paint booth AB-1, including VOC usage for clean-up, shall be less than 15 pounds per day.

Month: _____ Year: _____

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Fort Wayne Liquid Coatings, Inc.
Source Address: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2401 Meyer Road, Fort Wayne, Indiana 46803
FESOP No.: F003-13588-00010

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Federally Enforceable State Operating Permit

Source Name: Fort Wayne Liquid Coatings, Inc. (formerly ITT Aerospace)
Source Location: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
County: Allen
SIC Code: 3479, 7389, 8999
Operation Permit No.: F003-13588-00010
Permit Reviewer: Adeel Yousuf / EVP

On July 28, 2003, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Fort Wayne Liquid Coatings, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) for the construction and operation of a custom paint and stencil operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 1, 2003, Don Laukhuf, Plant Manager at Fort Wayne Liquid Coatings, Inc. submitted comments on the proposed FESOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Administrative Matters:

The company's operation in Howe, Indiana is not inactive. Please revise the mailing address in Paragraph A.1 to:

Fort Wayne Liquid Coatings, Inc.
2401 Meyer Road
Fort Wayne, Indiana 46803
(260) 426-7169
FAX (260) 426-6559

Response 1

Condition A.1 has been revised to insert the correct mailing address.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary custom paint and stencil operation.

Authorized individual:	President
Source Address:	3700 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address:	~~7605~~ **2401** ~~State~~ **Meyer** Road ~~9 North~~, ~~Howe~~ **Fort Wayne**, Indiana ~~46746~~ **46803**
General Source Phone:	(260) 562-9345
SIC Code:	3479, 7389, 8999

Mailing address has also been updated in Certification Form, Emergency Occurrence Form, FESOP Usage Report and Quarterly Deviation and Compliance Monitoring Report Form.

Comment 2

Airbrush Paint Booth:

Based on information developed during work on local building code matters, we have discovered that the air brush unit operation identified in A.2 (a) should have been described as a two step process:

- Application of decorative inks (examples attached).
- Application of clear coatings (protective sealers).

The ink application work is not subject to Allen County building code requirements and Indiana Department of Labor employee exposure concerns. This is in respect to having a closed spray booth, minimum air flow requirements and related fire protection and occupational health and safety matters.

We would appreciate your revising the summary information covering the air brush unit operation to describe that the airbrush portion of the work (application of decorative inks) takes place in an open building area and the application of the clear coating (sealer) takes place in one of the wet paint booths. Also, the air brush process should be described as “air atomization” rather than “high volume low pressure” spraying.

Response 2

Condition A.2 (a) has been revised to correctly state and clarify the description of airbrush paint booth operation.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) airbrush paint booth, identified as AB-1, **consisting of two step process including the application of decorative inks in an open building area and the application of clear coatings inside the wet paint booth,** using ~~high volume low pressure~~ **air atomization** spray application, coating a maximum of 0.40 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as AB-1A and AB-1B.

Comment 3

Wet Paint Activities:

In the original air permit application word done in February, 2003, we had described the two wet paint booths as follows:

- Bracket paint booth.
- Axle paint booth.

This special designation was used for descriptive and clarification purposes only. Fort Wayne Liquid Coatings offers a wide variety of job shop type custom coating service that can involve parts and components in addition to brackets and axles.

We would appreciate your revising the descriptions to wet paint booth 1 and 2.

Response 3

Conditions A.2 (c) and (d) have been revised to change the identification of wet paint booths as follows. Each descriptive information has been re-lettered as well to correct the minor typographical error. Also, Conditions D.1.5, D.1.6 and D.1.7 have been revised the update the correct description of the wet paint booths.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(~~c~~**b**) One (1) wet paint booth, identified as ~~bracket paint~~ booth **1**, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 1 and WPB 2.

(~~d~~**c**) One (1) wet paint booth, identified as ~~axle paint~~ booth **2**, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 3 and WPB4.

(~~e~~**d**) One (1) powder coating operation, identified as PC 1, with a maximum powder usage of 135 pounds per hour, using dry filters for particulate control, and exhausting indoors.

(~~f~~**e**) One (1) single chamber office paper incinerator, identified as INC 1, constructed in 1980, burning a maximum of 250 pounds of waste paper per hour, with a natural gas-fired primary chamber afterburner, rated at 0.8 MMBtu per hour, exhausting through one (1) stack (ID No. S/V-8).

D.1.5 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to metal parts in ~~the axle~~ **booth 1** and ~~bracket paint~~ booth~~s~~ **2** shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.6 Particulate ~~M~~atter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the airbrush paint booth (AB-1), the wet paint booths (~~axle paint booth and bracket paint booth~~ **1 and 2**), and the powder coating operation (PC 1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to and 326 IAC 6-3-2(d), particulate from the airbrush paint booth (AB-1), the wet paint booths (~~axle paint booth and bracket paint booth~~ **1 and 2**), and the powder coating operation (PC 1), shall be controlled by dry filters, and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

Facility descriptions under Section D.1 have also been revised accordingly, as a result of comments 2 and 3.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) airbrush paint booth, identified as AB-1, **consisting of two step process including the application of decorative inks in an open building area and the application of clear coatings inside the wet paint booth,** using ~~high volume low pressure~~ **air atomization** spray application, coating a maximum of 0.40 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as AB-1A and AB-1B.

(~~c~~**b**) One (1) wet paint booth, identified as ~~bracket paint~~ booth **1**, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 1 and WPB 2.

(~~d~~**c**) One (1) wet paint booth, identified as ~~axle paint~~ booth **2**, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 3 and WPB4.

(~~e~~**d**) One (1) powder coating operation, identified as PC 1, with a maximum powder usage of 135 pounds per hour, using dry filters for particulate control, and exhausting indoors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Fort Wayne Liquid Coatings, Inc. (formerly ITT Aerospace)**
Source Location:	**3700 East Pontiac Street, Fort Wayne, Indiana 46803**
County:	**Allen**
SIC Code:	**3479, 7389, 8999**
Operation Permit No.:	**F003-13588-00010**
Permit Reviewer:	**Adeel Yousuf / EVP**

The Office of Air Quality (OAQ) has reviewed a FESOP application from Fort Wayne Liquid Coatings relating to the construction and operation of a custom paint and stencil operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) airbrush paint booth, identified as AB-1, using high volume low pressure spray application, coating a maximum of 0.40 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as AB-1A and AB-1B.

(b) One (1) single chamber office paper incinerator, identified as INC 1, constructed in 1980, burning a maximum of 250 pounds of waste paper per hour, with a natural gas-fired primary chamber afterburner, rated at 0.8 MMBtu per hour, exhausting through one (1) stack (ID No. S/V-8).

New Emission Units and Pollution Control Equipment

The source also consists of the following new facilities/units:

(a) One (1) wet paint booth, identified as bracket paint booth, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 1 and WPB 2.

(b) One (1) wet paint booth, identified as axle paint booth, using air atomization spray application, coating a maximum of 150 units per hour, with dry filters for particulate overspray control, and exhausting at two (2) stacks, identified as WPB 3 and WPB4.

(c) One (1) powder coating operation, identified as PC 1, with a maximum powder usage of 135 pounds per hour, using dry filters for particulate control, and exhausting indoors.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:
  (1) Two (2) natural gas fired boilers burning No. 2 fuel oil as back-up, identified as B-2 and B-3, each constructed in 1996, each with a maximum heat input capacity of 5.845 MMBtu/hr, and each exhausting to one (1) stack, identified as stack #7 and stack #9, respectively.
  (2) Wash section with one (1) water heater rated at 2.5 MMBtu/hr, and exhausting at two (2) stacks, identified as WP 1A and WP 1B.
  (3) Dry off section with one (1) burner rated at 1.0 MMBtu/hr, and exhausting at two (2) stacks, identified as WP 2A and WP 2B.
  (4) One (1) cure and bake oven with a maximum rated capacity of 3.5 MMBtu/hr, and exhausting at two (2) stacks, identified as WP 3A and WP 3B.

(b) Paved and unpaved roads and parking lots with public access.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP003-4030-00010, issued on April 6, 1995;

(b) CP003-4713-00010, issued on January 29, 1996;

(c) CP003-5096-00010, issued February 21, 1996;

(d) CP003-5023-00010, issued April 26, 1996; and

(e) CP003-5438-00010, issued May 21, 1996.

(f) Interim Significant Source Modification No. 003-13588I-00010, issued on April 24, 2003.

All conditions from previous approvals were incorporated into this permit except the following:

(a) CP003-4713-00010, issued on January 29, 1996:

Reason not incorporated: CP003-4713-00010 is a permit for a soil vapor extraction system. ITT Aerospace/Communications Division, 1919 West Cook Road, Fort Wayne, Indiana, has retained responsibility for the site remediation work and operation of the soil vapor extraction system.

(b) CP003-5023-00010, issued April 26, 1996:

Reason not incorporated: The soldering operation permitted under CP003-5023-00010 has been discontinued.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the dry filters for particulate matter control on the powder coater be considered as an integral part of the powder coating operation:

The powder coating operation utilizes a small vibrating sieve unit and blender. The collected overspray would be screened to remove any debris, rocks, dirt, chips and related contamination. The screened materials would be transferred to a mechanical blender for mixing with new powder coating at an approximate 50 to 1 reuse ratio.

Economic considerations: Powder coating costs range from approximately $2.00 per pound to $10.00 per pound (average $6.00 per pound). Every pound of collected over spray that is available for use after the screening step replaces $6.00 of new material.

The value of the recovered over spray material should not be compared to the cost of the cartridge filter units because these are integral to the operations for fire protection and occupational safety and health requirements.

IDEM, OAQ has evaluated the justification and determined that the dry filters on the powder coater will not be considered as an integral part of the powder coating operation. Based on the above information, the powder recovery operation does not show an overwhelming cost savings.

135 pounds per hour (throughput) x 8760 hours per year x $6.00 per pound = $7,095,600

With a ratio of one (1) recycled pound for every fifty (50) pounds of new powder, the cost savings is $141,912. This is a two percent (2%) savings.

Therefore, the permitting level will be determined using the potential to emit before the dry filters.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on December 1, 2000. Additional information was received on August 17, 2001, March 3, 2003, and May 8, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 through 12.

Unrestricted Potential Emissions

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO_2	less than 100
VOC	less than 100
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/year)
glycol ethers	less than 10
xylene	less than 10
toluene	less than 10
MEK	less than 10
dibutyl phthalate	less than 10
TOTAL	less than 25

The unrestricted potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Powder Coating(1)	2.96	2.96	--	--	--	--	--	--
Surface Coating(1)	3.42	3.42	0.00	39.65	0.00	0.00	1.72	4.43
Incinerator(2)	3.83	0.00	1.37	1.64	5.84	1.64	0.00	0.00
Boilers(2)	0.73	0.73	25.97	0.58	4.30	7.31	negl.	negl.
heaters/bake oven (combustion)(2)	0.06	0.23	0.02	0.17	2.58	3.07	negl.	negl.
Total Emissions	11.00	7.34	27.36	41.74	12.72	12.02	1.72	4.43

1) Based on particulate emissions being controlled by dry filters.
2) Uncontrolled emissions.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

(b) Allen County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

(a) Two (2) boilers identified as B-2 and B-3, each constructed in 1996 and rated at 5.845 MMBtu per hour are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because each boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.

(b) The one (1) natural gas fired incinerator (INC 1) with maximum heat input rate of 0.8 MMBtu/hr and maximum charge capacity of 250 pounds per hour, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.50, Subpart E) because the maximum charge capacity of this incinerator is below the rule applicability threshold of 50 tons per day.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 20, and 40 CFR Part 61 and 63) applicable to this source.

(d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, that meets the following criteria:

(1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

(e) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because the source has a potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

This existing source was initially constructed after the August 7, 1977 rule applicability date, and was owned by ITT Aerospace/Communications division. Fort Wayne Liquid Coatings acquired ITT Aerospace/Communications Division in November, 2000. Although constructed and modified after the applicability date, this source is not considered a major source because it has the potential to emit less than 250 tons per year of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) are not applicable to this source.

326 IAC 2-4.1 (New Source Toxics Control)

This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of combination of HAPs greater than or equal to twenty-five (25) tons per year. Since this facility emits less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of combination of HAPs, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and this source does not have the potential to emit CO, VOC, NO_x, PM-10, or SO_2 at greater than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

40 CFR 52 Subpart P (Incinerators)

The one (1) natural gas fired incinerator, rated at 0.8 MMBtu/hr, is subject to the requirements of 40 CFR 52 Subpart P. Pursuant to this rule, the incinerator shall:

(a) consist of primary and secondary chambers or the equivalent;
(b) be equipped with a primary burner unless burning wood products;
(c) comply with 326 IAC 5-1 and 326 IAC 2;
(d) be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
(f) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
(g) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
(h) not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
(i) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

The office paper incinerator has a maximum exhaust rate of 0.29 pounds of PM per 1000 pounds of dry exhaust gas, corrected to fifty percent (50%) excess air. Therefore the incinerator is in compliance with this rule (see Appendix A, Page 10 of 12, for compliance calculations).

326 IAC 4-2-2 (Incinerators)

The one (1) natural gas fired incinerator, rated at 0.8 MMBtu/hr, is subject to the requirements of 326 IAC 4-2-2. Pursuant to this rule, the incinerator shall comply with the following:

(a) Pursuant to this rule, the incinerator shall comply with the following:
  (1) Consist of primary and secondary chambers or the equivalent.
  (2) Be equipped with a primary burner unless burning only wood products.
  (3) Comply with 326 IAC 5-1 and 326 IAC 2.
  (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).
  (5) Not emit particulate matter in excess of three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
  (6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An incinerator is exempt from subsection (a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(c) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:
  (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:
    (A) Procedures for receiving, handling, and charging waste.
    (B) Procedures for incinerator startup and shutdown.
    (C) Procedures for responding to a malfunction.
    (D) Procedures for maintaining proper combustion air supply levels.
    (E) Procedures for operating the incinerator and associated air pollution control systems.
    (F) Procedures for handling ash.
    (G) A list of wastes that can be burned in the incinerator.
  (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
  (3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

The office paper incinerator has a maximum exhaust rate of 0.29 pounds of PM per 1000 pounds of dry exhaust gas, corrected to fifty percent (50%) excess air. Therefore the incinerator is in compliance with this rule (see Appendix A, Page 10 of 12, for compliance calculations).

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) 5.845 MMBtu per hour boilers (ID Unit B-2 and B-3), each constructed in 1996, are subject to 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

$$Pt = \frac{1.09}{(11.69)^{0.26}} = 0.57 \text{ lb/MMBtu}$$

The allowable particulate emission rate from both boilers, based on the above equation, is 0.57 pounds PM per MMBtu heat input. Both boilers emit a maximum of 0.014 pounds of PM per MMBtu heat input, therefore, the boilers are in compliance with 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52 Subpart P the particulate matter (PM) from the airbrush paint booth (AB-1), the wet paint booths (axle paint booth and bracket paint booth), and the powder coating operation (PC 1) shall each be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Particulate from the airbrush paint booth (AB-1), the wet paint booths (axle paint booth and bracket paint booth), and the powder coating operation (PC 1) shall be controlled by dry filters. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Two (2) natural gas fired boilers (B-2 and B-3) burning No. 2 fuel oil as back-up, are not subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because each unit has potential to emit of SO_2 less than 25 tons per year and 10 pound per hour.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

New facilities, which have potential emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of this article (326 IAC 8), shall reduce VOC emissions using best available control technology (BACT).

The airbrush paint booth is subject to 326 IAC 8-2-2 (Automobile and light duty truck coating operations), and the axle and bracket coating booths are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating), therefore, the requirements under 326 IAC 8-1-6 (New Facilities

General Reduction Requirements), are not applicable.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

This rule applies to automobile and light duty truck surface coating operations located anywhere in the state that were constructed after July 1, 1990, which have actual volatile organic compound (VOC) emissions of greater than fifteen (15) pounds per day before add-on controls, and which are not otherwise regulated by another provision of Article 8.

The airbrush paint booth (ID AB-1) used to apply custom graphics on to automobiles was constructed in 2001 and has actual VOC emissions greater than fifteen (15) pounds per day. The source has opted to limit actual VOC emissions from the airbrush paint booth (ID AB-1) to less than fifteen (15) pounds per day. Therefore, rule 326 IAC 8-2-2 is not applicable to the airbrush paint booth (ID AB-1). The source shall maintain records of daily coating material usage to demonstrate compliance with this limitation.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This rule applies to metal coating facilities located anywhere in the state that were constructed after July 1, 1990, which have actual volatile organic compound (VOC) emissions of greater than fifteen (15) pounds per day before add-on controls, and which are not otherwise regulated by another provision of Article 8.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts at this source, including coatings delivered to the applicators at the axle and bracket paint booths, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air (i.e., less than 90EC or 194 EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the axle and bracket paint booths are in compliance with this requirement.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source constructed after 1980, does not have potential VOC emission at, or in excess of 100 tons per year, therefore, this rule does not apply.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. This source is located in Allen County. Therefore, this rule is not applicable to this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a

result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1) The paint spray booths, (AB-1,bracket booth, and axle booth), each using dry filters for particulate control, and each exhausting to two (2) stacks/vents AP-1A, AB-1B, WPB1, WPB2, WPB3 and WPB4, respectively, have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, AP-1A, AB-1B, WPB1, WPB2, WPB3 and WPB4, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

   (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the surface coating processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The construction and operation of this custom paint and stencil operation shall be subject to the conditions of the attached proposed FESOP No.: F003-13588-00010.

Appendix A: Emission Calculations

Company Name: Fort Wayne Liquid Coatings
Source Location: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
FESOP: 003-13588-00010
Plt ID: 003-00010
Reviewer: Adeel Yousuf/EVP
Date: April 18, 2003

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	Boilers Combustion (Worst Case)	Surface Coating Airbrush and Wet Paint Booths	Powder Coating	Natural Gas Combustion	Incinerator	**TOTAL**
PM	0.73	68.33	295.65	0.06	3.83	368.60
PM10	0.73	68.33	295.65	0.23	0.00	364.94
SO2	25.97	0.00	0.00	0.02	1.37	27.36
NOx	7.31	0.00	0.00	3.07	1.64	12.02
VOC	0.28	39.65	0.00	0.17	1.64	41.74
CO	4.30	0.00	0.00	2.58	5.84	12.72
total HAPs	negl.	4.43	0.00	negl.	0.00	4.43
worst case single HAP	negl.	1.72	0.00	negl.	0.00	1.72
		glycol ethers				

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	No. 2 Distillate Oil Combustion	Surface Coating Airbrush and Wet Paint Booths	Powder Coating	Natural Gas Combustion	Incinerator	**TOTAL**
PM	0.73	3.42	2.96	0.06	3.83	11.00
PM10	0.73	3.42	2.96	0.23	0.00	7.34
SO2	25.97	0.00	0.00	0.02	1.37	27.36
NOx	7.31	0.00	0.00	3.07	1.64	12.02
VOC	0.28	39.65	0.00	0.17	1.64	41.74
CO	4.30	0.00	0.00	2.58	5.84	12.72
total HAPs	negl.	4.43	0.00	negl.	0.00	4.43
worst case single HAP	negl.	1.72	0.00	negl.	0.00	1.72
		glycol ethers				

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Fort Wayne Liquid Coatings**
Source Location: **3700 East Pontiac Street, Fort Wayne, Indiana 46803**
FESOP: **003-13588-00010**
Plt ID: **003-00010**
Reviewer: **Adeel Yousuf/EVP**
Date: **April 18, 2003**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.0	61.3

Heat input capacity includes Stage 1 wash water heater (2.5 MMBtu/hr), Dry off section heater (1.0 MMBtu/hr) and Bake oven burner (3.5 MMBtu/hr).

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.06	0.23	0.02	3.07	0.17	2.58

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

HAPs Emissions
Company Name: Fort Wayne Liquid Coatings
Source Location: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
MSOP: 003-13588-00010
Plt ID: 003-00010
Reviewer: Adeel Yousuf/EVP
Date: April 18, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.439E-05	3.679E-05	2.300E-03	5.519E-02	1.042E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.533E-05	3.373E-05	4.292E-05	1.165E-05	6.439E-05

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 MMBtu/hr)
#1 and #2 Fuel Oil

Company Name: **Fort Wayne Liquid Coatings**
Source Location: **3700 East Pontiac Street, Fort Wayne, Indiana 46803**
FESOP: **003-13588-00010**
PIt ID: **003-00010**
Reviewer: **Adeel Yousuf/EVP**
Date: **April 18, 2003**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
11.69	731.46	0.5

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	0.73	25.97	7.31	0.12	1.83

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
See page 5 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: **Fort Wayne Liquid Coatings**
Source Location: **3700 East Pontiac Street, Fort Wayne, Indiana 46803**
FESOP: **003-13588-00010**
PIt ID: **003-00010**
Reviewer: **Adeel Yousuf/EVP**
Date: **April 18, 2003**

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	2.05E-04	1.54E-04	1.54E-04	1.54E-04	4.61E-04

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	1.54E-04	3.07E-04	1.54E-04	7.68E-04

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emission Calculations
Powder Coating

Company Name: Fort Wayne Liquid Coatings
Source Location: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
FESOP: 003-13588-00010
Plt ID: 003-00010
Reviewer: Adeel Yousuf/ EVP
Date: April 18, 2003

Particulates

Potential to Emit (tons/yr):

Process	Material Usage (lbs/hr)	Control Efficiency	Uncontrolled Emissions (lbs/hr)	Uncontrolled Emissions (tons/yr)
Powder Coating Booth	135	99.00%	67.5	295.65

Methodology
Powder Coat Maximum Usage Rate (lb/hr) = 135 lbs/hr. Assume 50% of the coating material emitted as worst case.
Potential Powder Coat Emissions (ton/yr) = 67.5 lbs/hr * 8760 hrs/yr * 1ton/2,000 lbs

Limited Emissions (tons/yr):

Process	Material Usage (lbs/hr)	Control Efficiency	Controlled Emissions (lbs/hr)	Controlled Emissions (tons/yr)
Powder Coating Booth	135	99.00%	67.5	2.96

Methodology
Powder Coat Maximum Usage Rate (lb/hr) = 135 lbs/hr. Assume 50% of the coating material emitted as worst case.
Potential Powder Coat Emissions (ton/yr) = 67.5 lbs/hr * 8760 hrs/yr * 1ton/2,000 lbs * (1 - control efficiency)

VOC

Process	Material Usage (lbs/hr)	VOC Content	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
Powder Coating Booth	135	0.08%	0.108	0.47304

Methodology
Potential VOC Emissions (ton/yr) = 135 lbs/hr * 0.08% (VOC content) * 8760 hrs/yr * 1ton/2,000 lbs

Appendix A: Emission Calculations
Office Paper Incinerator

Company Name: **Fort Wayne Liquid Coatings**
Source Location: **3700 East Pontiac Street, Fort Wayne, Indiana 46803**
FESOP: **003-13588-00010**
Plt ID: **003-00010**
Reviewer: **Adeel Yousuf/EVP**
Date: **April 18, 2003**

THROUGHPUT
lbs/hr
250

THROUGHPUT
ton/yr
1095

	POLLUTANT				
	PM	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	3.83	1.37	5.48	1.64	1.64

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Fort Wayne Liquid Coatings
Source Location: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
FESOP: 003-13588-00010
Plt ID: 003-00010
Reviewer: Adeel Yousuf/EVP
Date: April 18, 2003

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Dibutyl Phthalate	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Dibutyl Phthalate (ton/yr)	Glycol Ethers Emissions (ton/yr)
Airbrush Booth 1													
As Applied													
Enamel 3440 S	8.34	2.000000	0.40	0.50%	5.00%	3.00%	0.00%	3.00%	0.15	1.46	0.88	0.00	0.88
Activator 193 S	9.01	0.500000	0.40	0.00%	0.00%	0.00%	0.00%	4.00%	0.00	0.00	0.00	0.00	0.32
Axle Booth													
Whitco SG HS Black	10.93	0.012000	150.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Brackets Booth													
Sheboygan 71-261 A	10.13	0.002000	150.00	0.00%	0.00%	0.00%	1.69%	4.00%	0.00	0.00	0.00	0.22	0.53
Total State Potential Emissions									**0.15**	**1.46**	**0.88**	**0.22**	**1.72**

METHODOLOGY **Total HAPs =** **4.43**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Incinerator Compliance with 326 IAC 4-2-2

Company Name: Fort Wayne Liquid Coatings
Source Location: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
FESOP: 003-13588-00010
Plt ID: 003-00010
Reviewer: Adeel Yousuf/EVP
Date: 04/18/03

Office Paper Incinirator (INC-1)

Potential PM emissions	0.87	lb/hr	
Stack gas flow rate	2000.00	acfm	1183
Gas temperature	120.00	deg F	
Incinerator Throughput	250.00	lb/hr	

Q,std = Volumetric flow rate at Standard Temperature

Q,std = 2000 acfm x 529 / 2328 deg R = **454.47** dscfm

Cs = PM Concentration

Cs = 0.87 lb/hr / 454.47 dscfm x 7000 gr/lb / 60 min/hr = **0.224** gr/dscf

Corrected to 50% excess air

Cs, corrected = 0.224 gr/dscf x (100+0)% / 150% = **0.150** gr/dscf

Ideal Gas Law

Specific Volume = R x T / P x Mw where

R = gas constant = 21.9(in Hg)(ft^3) / (lb mol)(deg R)
T = standard temp = 529 deg R
P = standard pressure = 29.45 in Hg
Mw = avg molecular weight of air = 29 lb/lbmol

Specific Volume = **13.565** cf/lb air

Cs, corrected = 0.150 gr/dscf x 13.565 cf/lb air = **2.030** gr/lb air

2.030 gr/lb air x 1/7000 lb pm/gr = 0.00029 lb PM/lb dry gas = **0.2900** lb PM/1000 lb dry gas

Maximum allowable particulate emission pursuant to 326 IAC 4-2-2 is 0.3 lb PM/1000 lb dry gas.
The office paper incinerator is in compliance with 326 IAC 4-2-2.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Fort Wayne Liquid Coatings**
Source Location: **3700 East Pontiac Street, Fort Wayne, Indiana 46803**
FESOP: **003-13588-00010**
Plt ID: **003-00010**
Reviewer: **Adeel Yousuf/EVP**
Date: **April 18, 2003**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.0	61.3

Heat input capacity includes Stage 1 wash water heater (2.5 MMBtu/hr), Dry off section heater (1.0 MMBtu/hr) and Bake oven burner (3.5 MMBtu/hr).

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.06	0.23	0.02	3.07	0.17	2.58

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

HAPs Emissions
Company Name: Fort Wayne Liquid Coatings
Source Location: 3700 East Pontiac Street, Fort Wayne, Indiana 46803
MSOP: 003-13588-00010
Plt ID: 003-00010
Reviewer: Adeel Yousuf/EVP
Date: April 18, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.439E-05	3.679E-05	2.300E-03	5.519E-02	1.042E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.533E-05	3.373E-05	4.292E-05	1.165E-05	6.439E-05

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.